

Edward L. Schnitzer
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437 Madison Ave
New York, New York 10022
(212) 867-9500

Attorneys for Hankook Tire America Corp.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
	:	
In re:	:	Chapter 11
	:	
SEARS HOLDINGS CORPORATION, <i>et al.</i> ,	:	Case No. 18-23538-rdd
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X		

NOTICE OF APPEARANCE AND DEMAND FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that pursuant to 11 U.S.C. § 1109(b) and Fed. R. Bankr. P. 9010(b), Montgomery McCracken Walker & Rhoads LLP, as counsel to Hankook Tire America Corp., a creditor and party in interest in the bankruptcy cases of Sears Holding Corporation, *et al.*, hereby demands service of all notices and papers herein upon:

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PLEASE TAKE FURTHER NOTICE that the foregoing demand includes all pleadings of any kind, including, without limitation, all notices, motions, and orders, whether written or oral, formal or informal, however transmitted.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance and Demand for Service of Papers (the "Notice") nor any later appearance or pleading shall

constitute a waiver of:

- a) rights to have any and all final orders in any and all non-core matters entered only after de novo review by a United States District Judge;
- b) rights to trial by jury in any proceedings as to any and all matters so triable, whether or not the same be designated legal or private rights, or in any case, controversy or pursuant to 28 U.S.C. § 157(b)(2), and whether such jury trial right is pursuant to statute or the United States Constitution;
- c) rights to seek abstention or remand of any matter or proceeding subject to mandatory discretionary abstention or remand, and to have the District Court withdraw the reference in any matter or proceeding subject to mandatory or discretionary withdrawal;
- d) rights to receipt of service of process in all actions, causes, claims, or proceedings arising in, arising under or related to these proceedings to be served directly on Hankook Tire America Corp.; or
- e) rights to contest service of process.

All of the above rights are expressly reserved and preserved by Hankook Tire America Corp. without exception.

Dated: June 14, 2019
New York, New York

**MONTGOMERY McCRACKEN WALKER
& RHOADS LLP**

/s/ Edward L. Schnitzer

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing instrument has been served on this 14th day of June, 2019 upon (a) all parties requesting service via ECF notification and (b) all parties identified in the Master Service List as of 6/11/2019 available at <https://restructuring.primeclerk.com/sears/Home-Index>.

/s/ Edward L. Schnitzer

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